

SEALED

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

United States of America

v.

Isaiah Elijah Abraham Vallejo

CRIMINAL COMPLAINT

(Filed Under Seal)

CASE NUMBER: 22-9503 MJ

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

On or about the dates described in Attachment A in the County of Maricopa in the District of Arizona, the defendant violated Title 18 U.S.C. § 2422(b) and Title 18 U.S.C. §§ 2251(a) and (e) offenses described as follows:

See Attachment A – Description of Counts

I further state that I am a Special Agent from the Federal Bureau of Investigation and that this complaint is based on the following facts:

See Attachment B – Statement of Probable Cause Incorporated by Reference Herein.

Continued on the attached sheet and made a part hereof: Yes No

AUTHORIZED BY: Brett A. Day, AUSA BRETT DA Digital signature by BRETT D.
Date: 2022.12.16 15:33:13
-0700'

SA Emily Steele, FBI
Name of Complainant

Subscribed and sworn electronically

December 16, 2022 @4:22 pm
Date


Signature of Complainant

Phoenix, Arizona
City and State

HONORABLE EILEEN S. WILLETT
United States Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

ATTACHMENT A
DESCRIPTION OF COUNTS

COUNT 1

4 On or between approximately October 1, 2021 through November 29, 2022, in the
5 District of Arizona and elsewhere, the defendant, ISAIAH ELIJAH ABRAHAM VALLEJO,
6 did unlawfully and knowingly use any facility and means of interstate and foreign commerce
7 to attempt to persuade, induce, entice, and coerce any individual who had not attained the age
8 of 18 years, to engage in any sexual activity for which any person can be charged with a
9 criminal offense, including Idaho Code § 15-1506 (Sexual Abuse of a Child) and Idaho Code
10 § 15-1508 (Lewd Conduct with a Minor Child).

All in violation of Title 18, United States Code, Section 2422(b).

COUNT 2

13 On or between approximately October 1, 2021 through November 29, 2022, in the
14 District of Arizona, Defendant ISAIAH ELIJAH ABRAHAM VALLEJO did attempt to
15 knowingly employ, use, persuade, entice, induce and coerce a minor, that is, Jane Doe, age 15
16 to engage in sexually explicit conduct for the purpose of producing any visual depiction of
17 such conduct and transmitting a live visual depiction of such conduct knowing and having
18 reason to know that the visual depiction would be transported and transmitted using any
19 means and facility of interstate and foreign commerce, and in and affecting interstate and
20 foreign commerce and mailed if the visual depiction was produced and transmitted using
21 materials that have been mailed, shipped, and transported in and affecting interstate and
22 foreign commerce by any means, including by computer, and such visual depiction was
23 actually transported and transmitted using any means and facility of interstate and foreign
24 commerce and in and affecting interstate and foreign commerce and mailed, and did attempt
25 to do so.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2256.

ELECTRONICALLY SUBMITTED

STATEMENT OF PROBABLE CAUSE

I, Emily Steele, Special Agent with Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows, to wit:

INTRODUCTION

6 The facts of this case, as more fully detailed herein, are that on dates between December
7 2021 and November 2022 Isaiah Elijah Abraham **VALLEJO**, who resides in Phoenix, Arizona,
8 was in contact with the VICTIM who resides in Idaho. Thirty-two-year-old VALLEJO was
9 grooming and engaging in sexually explicit conversations with the fifteen-year-old VICTIM via
10 Snapchat and text, to include nude photos of himself and requests of nude photos from the
11 VICTIM. The VICTIM's mother discovered the conversations and reported the activities to the
12 FBI on November 11, 2022.

13 The VICTIM's mother revealed that the VICTIM gave her VALLEJO's information, to
14 include his birthday of XX-XX-1990 (full birthdate known to me), that he lived in Phoenix and
15 that he works in Information Technology (I.T.). VALLEJO sent photos of himself to the
16 VICTIM with his face fully visible. The VICTIM's mother took pictures of the text
17 communications between the VICTIM and VALLEJO and provided two phone numbers for
18 VALLEJO. VALLEJO and the VICTIM discussed VALLEJO traveling from Arizona to Idaho
19 over the VICTIM's winter school break, which the VICTIM disclosed as being from December
20 27 through January 1. In the communications, the VICTIM tells VALLEJO she is 15 years, along
21 with multiple messages that refer to the VICTIM not yet being 18.

22 I was able to obtain a driver license for Isaiah Elijah Abraham Vallejo, residing in Phoenix
23 at his known address. The license photo visually matches the photos VALLEJO sent to the
24 VICTIM.

25 In this affidavit, I believe there is probable cause to believe that Isaiah Elijah Abraham
26 **VALLEJO** coerced or enticed a minor, or attempted to do so, in violation of Title 18 U.S.C. §
27 2422(b) and produced or attempted to produce child pornography in violation of 18 U.S.C. §§
28 2251(a) and (e).

PRELIMINARY BACKGROUND INFORMATION

2 1. I am a Special Agent with the FBI assigned to the Phoenix Division. I have been so
3 employed for four years and I am specifically assigned to conduct investigations pursuant to the
4 FBI's Innocent Images National Initiative (IINI), which focuses on crimes where computers and
5 the Internet are used in the sexual exploitation of children. I am responsible for conducting
6 federal and international investigations relating to crimes involving the sexual exploitation of
7 children. I have received basic, advanced, and on-the-job training in the investigation of cases
8 involving the sexual exploitation of children. The statements contained in this Affidavit are
9 based on my experience and background as a Special Agent and on information provided by
10 other law enforcement agents.

DETAILS OF THE INVESTIGATION

12 2. Between at least December 2021 and November 2022, VALLEJO and VICTIM have been
13 engaging in sexually explicit conversations via Snapchat and text messaging, to include
14 soliciting the VICTIM to produce child pornography.

15 3. On November 11, 2022, the victim's mother reported to the FBI that her fifteen-year-old
16 daughter (VICTIM) was being groomed and sexually exploited for approximately one year by
17 Isaiah Vallejo (VALLEJO) who is located in Phoenix, Arizona. The mother reported that the
18 VICTIM met VALLEJO in a chat room unknown to her, then moved their communications to
19 Snapchat. On Snapchat the VICTIM and VALLEJO exchanged nude photos. Once the mother
20 discovered what was going on, she took her daughter's tablet and gave her a text and call only
21 phone. The mother then discovered that VALLEJO and her daughter were then communicating
22 via text. The VICTIM told her mother that the guys' name was Isaiah Vallejo, DOB XX-XX-
23 1990, he lived in Phoenix and he works in I.T. as a Linux System Administrator. The VICTIM
24 also showed her mother a photo of VALLEJO's face.

25 4. On December 1, 2022, an FBI Special Agent interviewed the mother at her home in
26 Pocatello, Idaho. The mother stated that on October 10, 2022, she walked in on her underage
27 daughter (VICTIM) masturbating in front of a male with his shirt off on a video chat on the
28 daughter's tablet. The mother grabbed the tablet and saw multiple nude photos and videos of

1 both the man and her daughter on Snapchat. The mother took the tablet away from her daughter
2 at this time.

3 5. Weeks after the above-mentioned incident, the mother returned the tablet to her daughter
4 and discovered that her daughter and VALLEJO were now texting. VALLEJO was saved as
5 "Hubby" in the VICTIM's phone.

6 6. The mother gave her daughter's cell phone and tablet to the FBI, as well as a USB
7 containing all photos she took of the texts between the VICTIM and VALLEJO. The FBI in
8 Idaho then sent these items to myself via FBI mail for review.

9 7. I reviewed the chats between VALLEJO and the Victim, exact dates unknown but from
10 approximately the months of October 2022 through November 2022, and saw the following
11 conversations:

12 VICTIM: I miss you so much

13 VICTIM: I hate this class. There's literally nobody in here

14 VICTIM: I wish you were my study hall teacher. That would make things SO much more
15 interesting for me

16 VALLEJO: If I was your study hall teacher, I'd be studying the back of your throat.

17 VALLEJO: If I was your study hall teacher, I'd make it out study the big fat piece of meat
18 between my legs in great detail using only your tongue. I'll make you explore it up and down so
19 you can watch how it changes size and thickness.

20

21

22

23

24

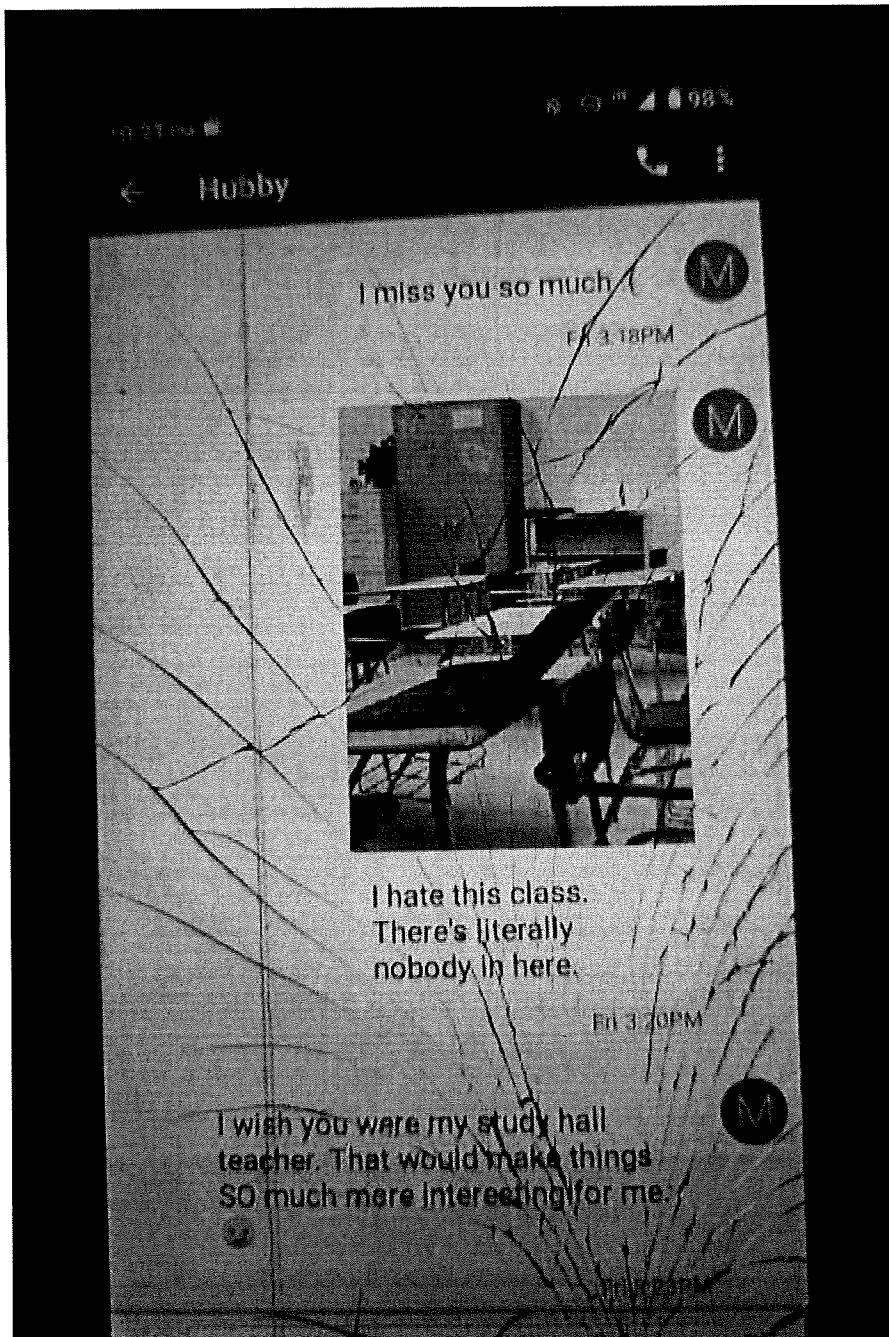
25

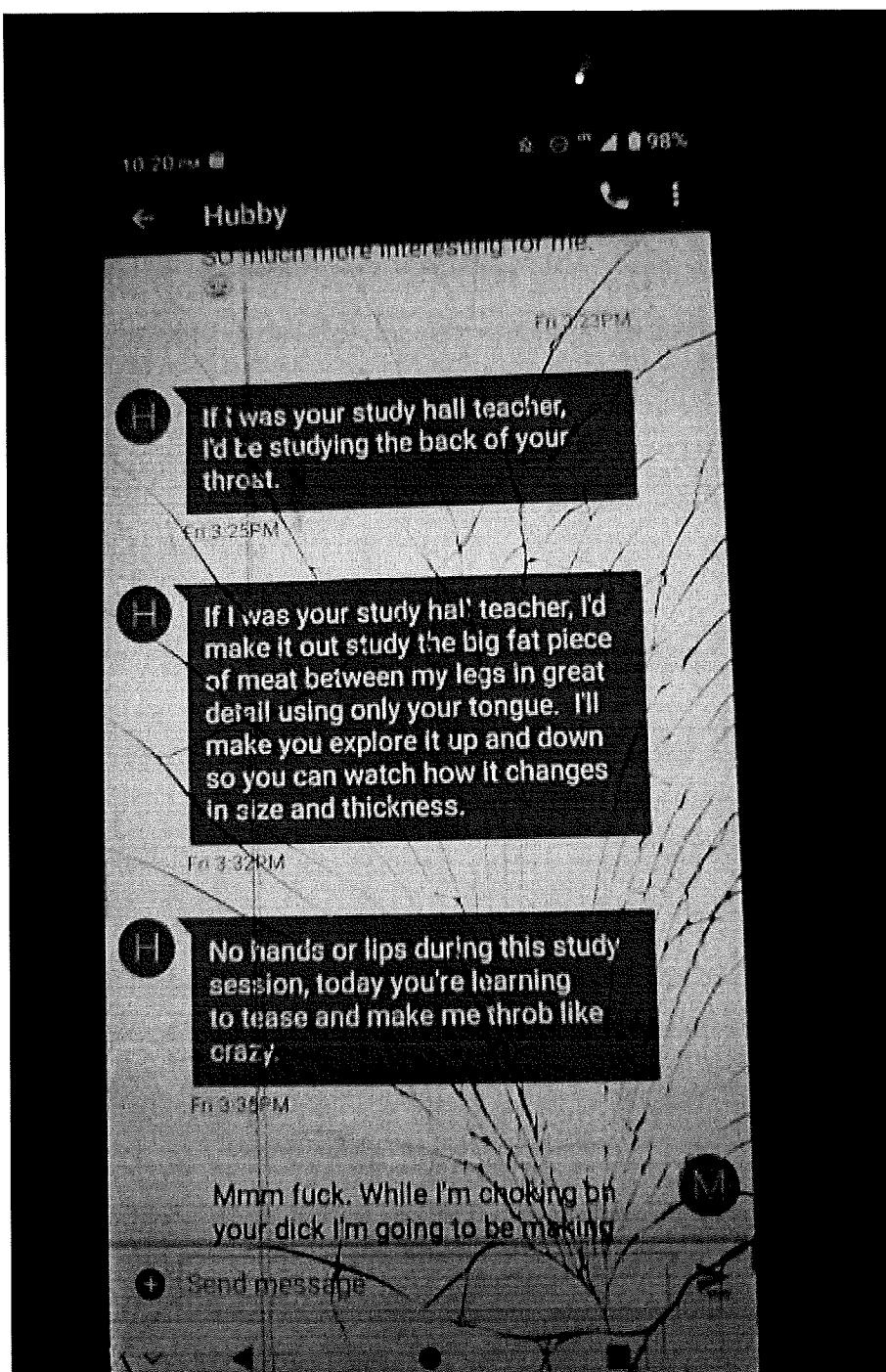
26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28





1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 VALLEJO: I can't wait to finger you while I French kiss your clit

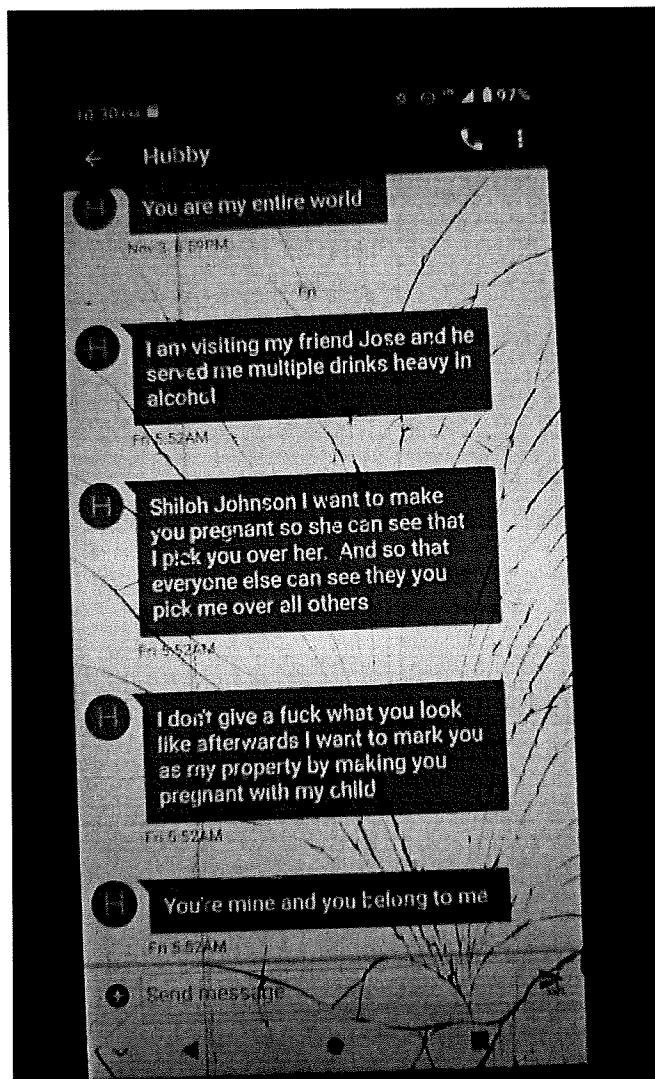
2 VALLEJO: Mmm I'm going to play that pussy like a musical instrument and the music we
3 make together will be the sounds of your beautiful moans

4 VICTIM: Stoppp I'm in school

5 VICTIM: Actually keep going 😊

6 VALLEJO: I want to make you pregnant so she can see that I pick you over her. And so
7 that everyone else can see they you pick me over all others

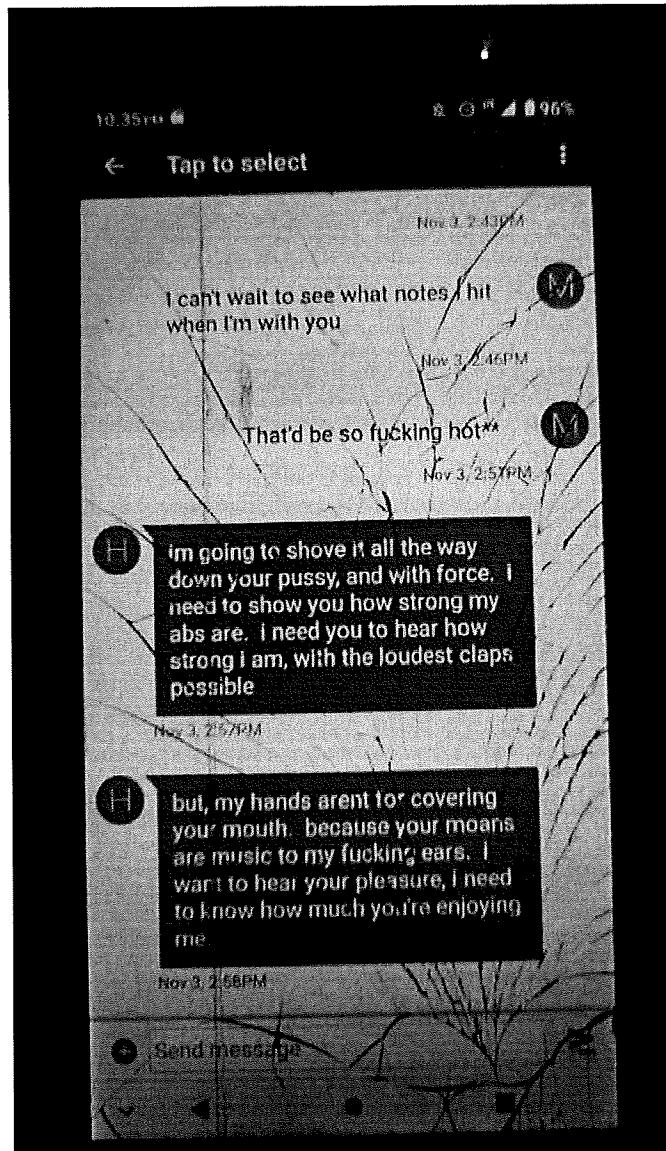
8 VALLEJO: I don't give a fuck what you look like afterwards I want to mark you as my
9 property by making you pregnant with my child



28 VALLEJO: You are mine and belong to me

1
2 VALLEJO: I'm going to shove it all the way down your pussy, and with force. I need to
3 show you how strong my abs are, I need you to hear how strong I am, with the loudest claps
4 possible.

5 VALLEJO: but, my hands aren't for covering your mouth because your moans are music
6 to my fucking ears. I want to hear your pleasure, I need to know how much you're enjoying me.



1 VALLEJO: You: I love you Isaiah ❤

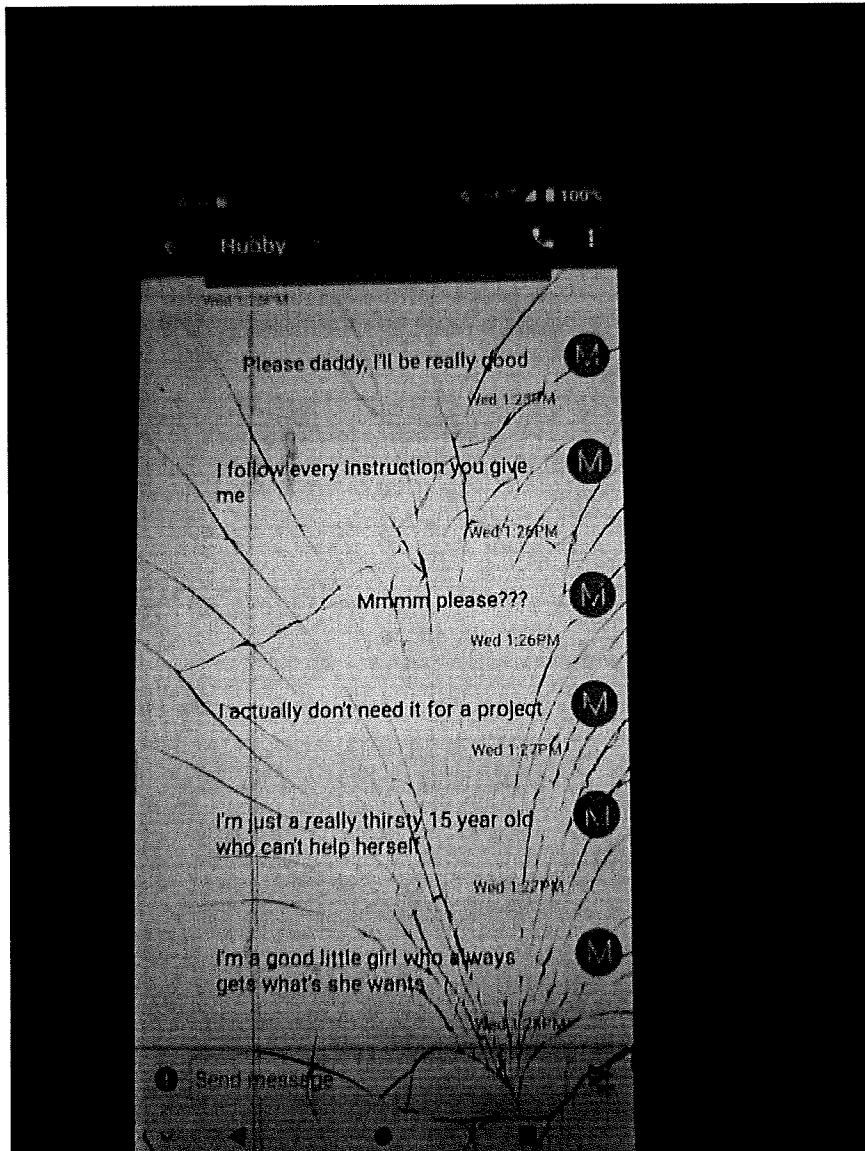
2 VALLEJO: I really really wanna teach you to talk dirty to me while you suck my dick.

3 While you're rubbing your tongue up and down the sides and while it's deep in your throat.

4 Teach you how to be an extra dirty blonde.

5 VICTIM: I'm just a really thirsty 15-year-old who can't help herself. I'm a good little girl

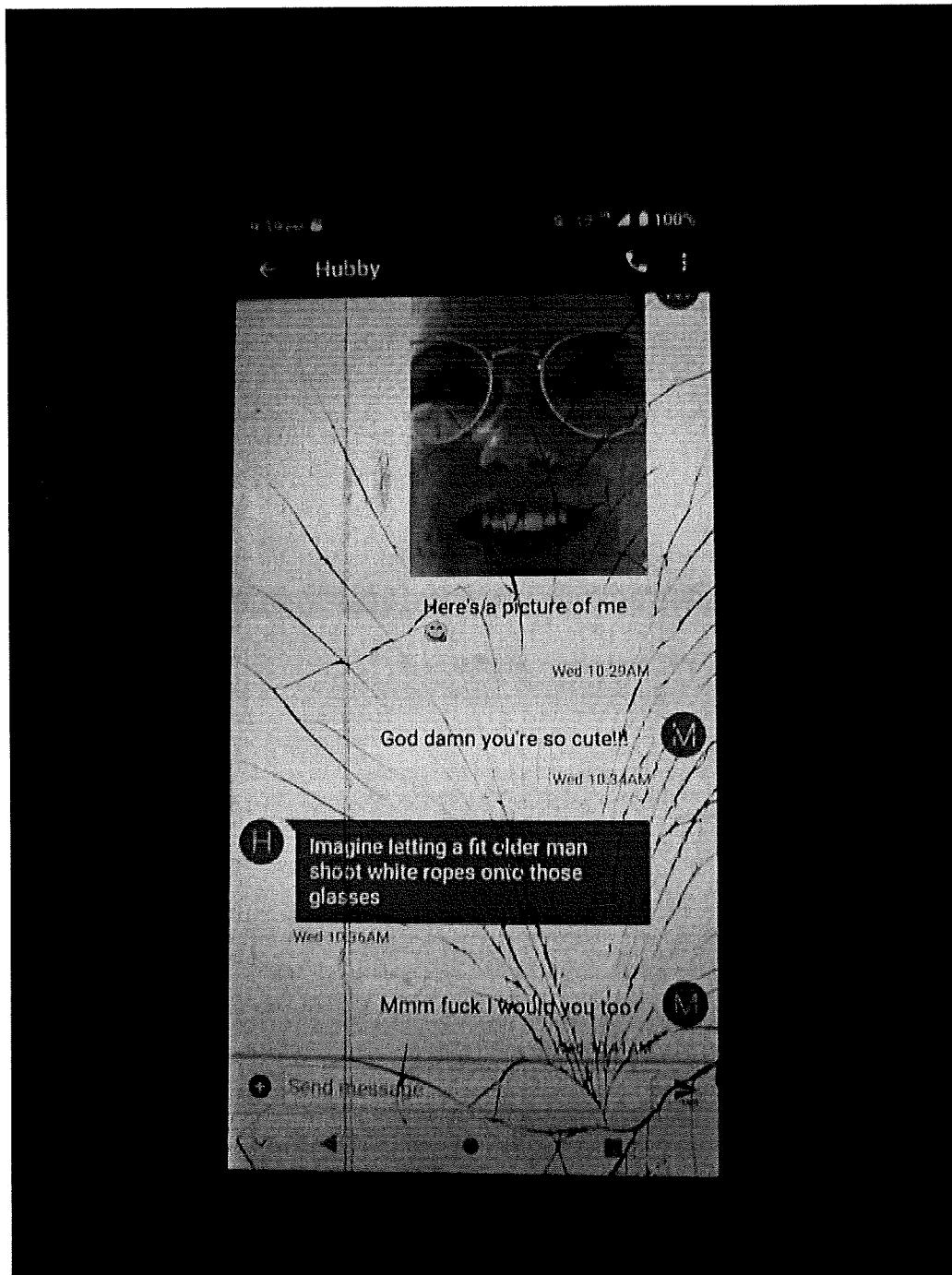
6 who gets what she wants

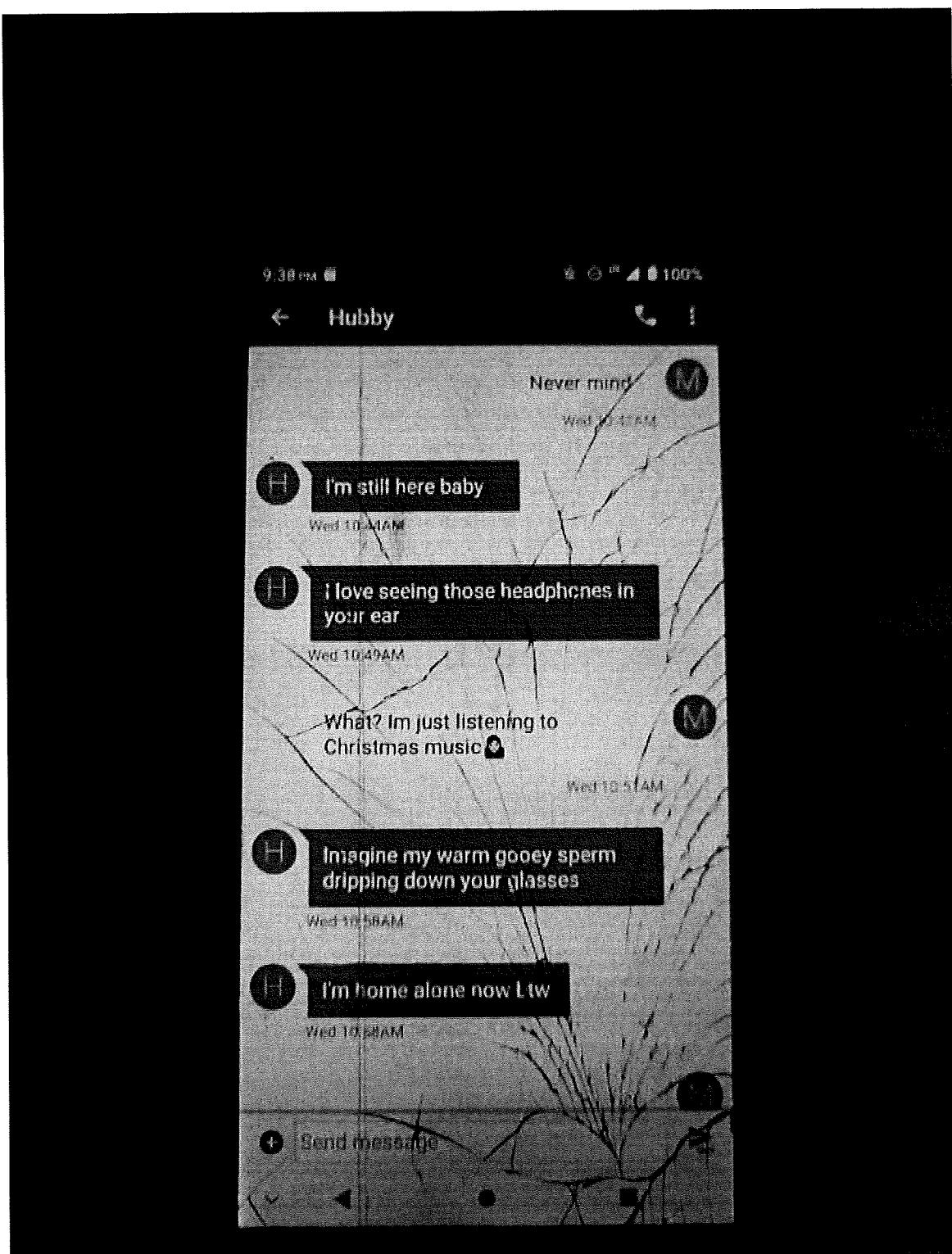


VICTIM: Here's a picture of me (selfie, not explicit)

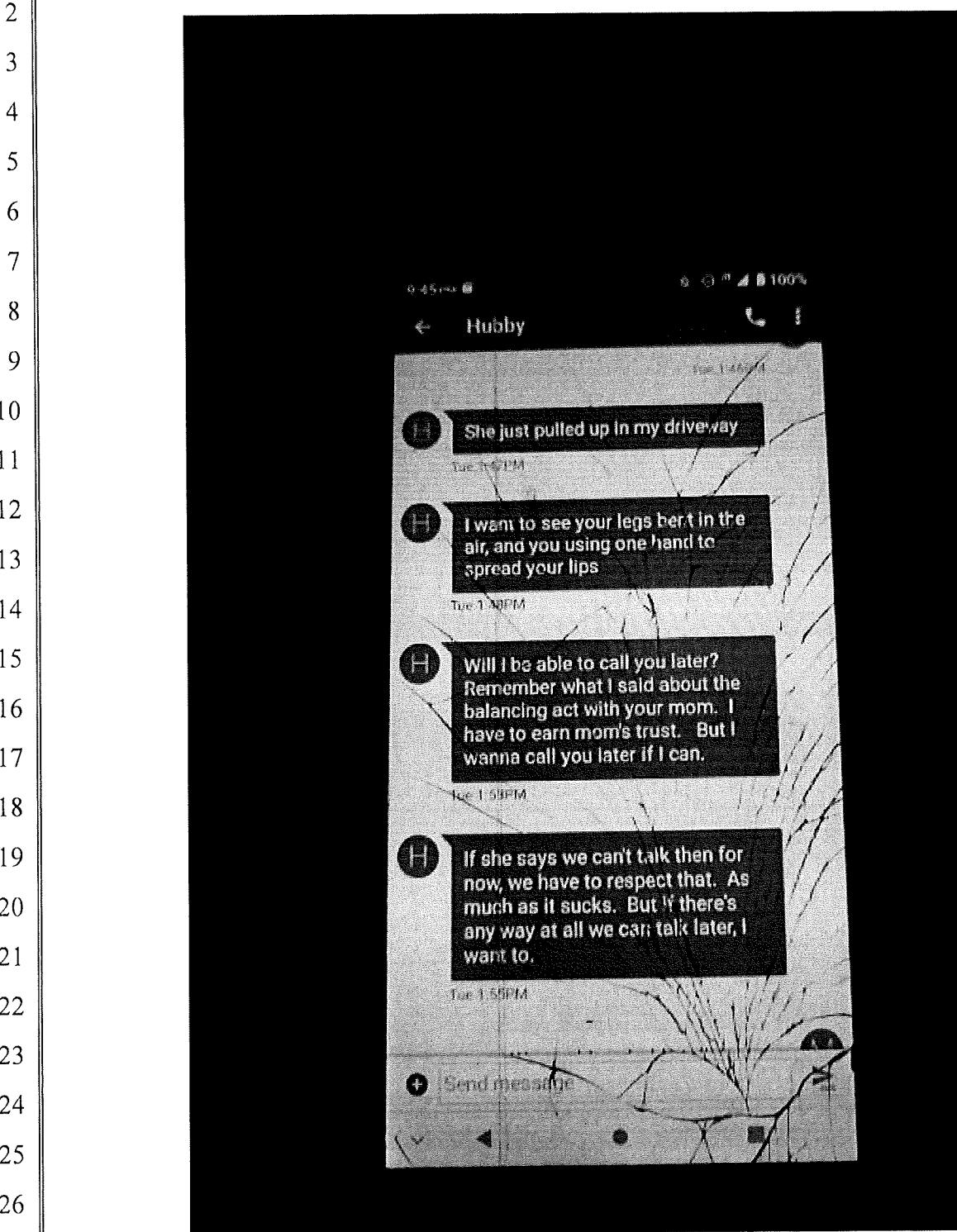
1 VALLEJO: Imagine letting a fit older man shoot white ropes onto those glasses

2 VALLEJO: Imagine my warm gooey sperm dripping down your glasses





1 VALLEJO: I want to see your legs bent in the air and you using one hand to spread your lips.



27
28 VICTIM: **Sends photo of her genitals with her fingers spreading her vagina open**

1 VICTIM: I love you Isaiah. I love you so damn much. You make me feel so incredibly
2 wanted and loved in your presence that no other guy has made me feel I want to belong and give
3 up every fiber of my being. When I'm 18, I want to move to you as SOON as possible. So we
4 can start living our lives together.

5 VICTIM: Are we going to cuddle and hold one another?

6 VICTIM: I'll keep you warm

7 VALLEJO: Oh without a doubt I'll keep you warm by hugging you tight but I had another
8 method in mind specifically for keeping those feet warm....

9 VALLEJO: You won't be innocent when I'm through with you.

10 VALLEJO: What we are doing is wrong, but only if we both aren't serious about a future
11 together. You are not temporary to me. The things I'm doing to be able to spend time with you
12 I absolutely know it's wrong but I am powerless to resist you. All I can think about every second
13 of the day is you.

14 VALLEJO: Imagine getting my dick sloppy wet before I use it to spread your saliva all
15 over your face like butter

16 VALLEJO: I promise you that I WILL remove her from my life. I WILL ensure that nothing
17 holds me back from you. I WILL do everything in my power to keep you in my life, to keep you
18 safe and protected, to show you my love and undying affectionate towards the most perfect
19 woman in the world.

20 VALLEJO: BABY

21 VICTIM: Is my blonde hair not good enough for you

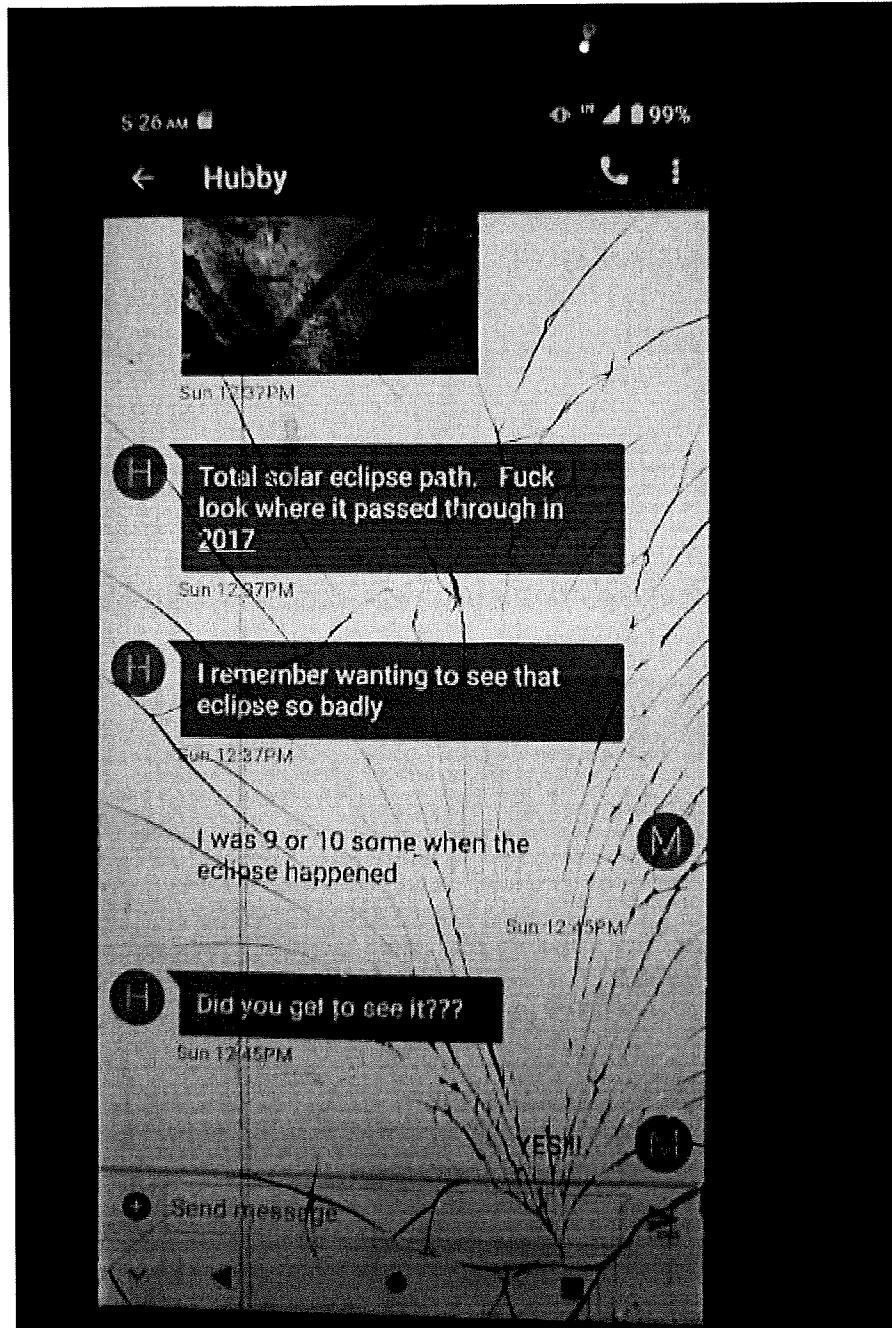
22 VALLEJO: At least let me fuck you with a fire red wig.

23 VALLEJO: Mmmmm fine..

24
25 VALLEJO: Total solar eclipse path. Fuck look where it passed through in 2017. I remember
26 wanting to see the eclipse so badly.

27 Victim: I was 9 or 10 when the eclipse happened

28 VALLEJO: Did you get to see it??



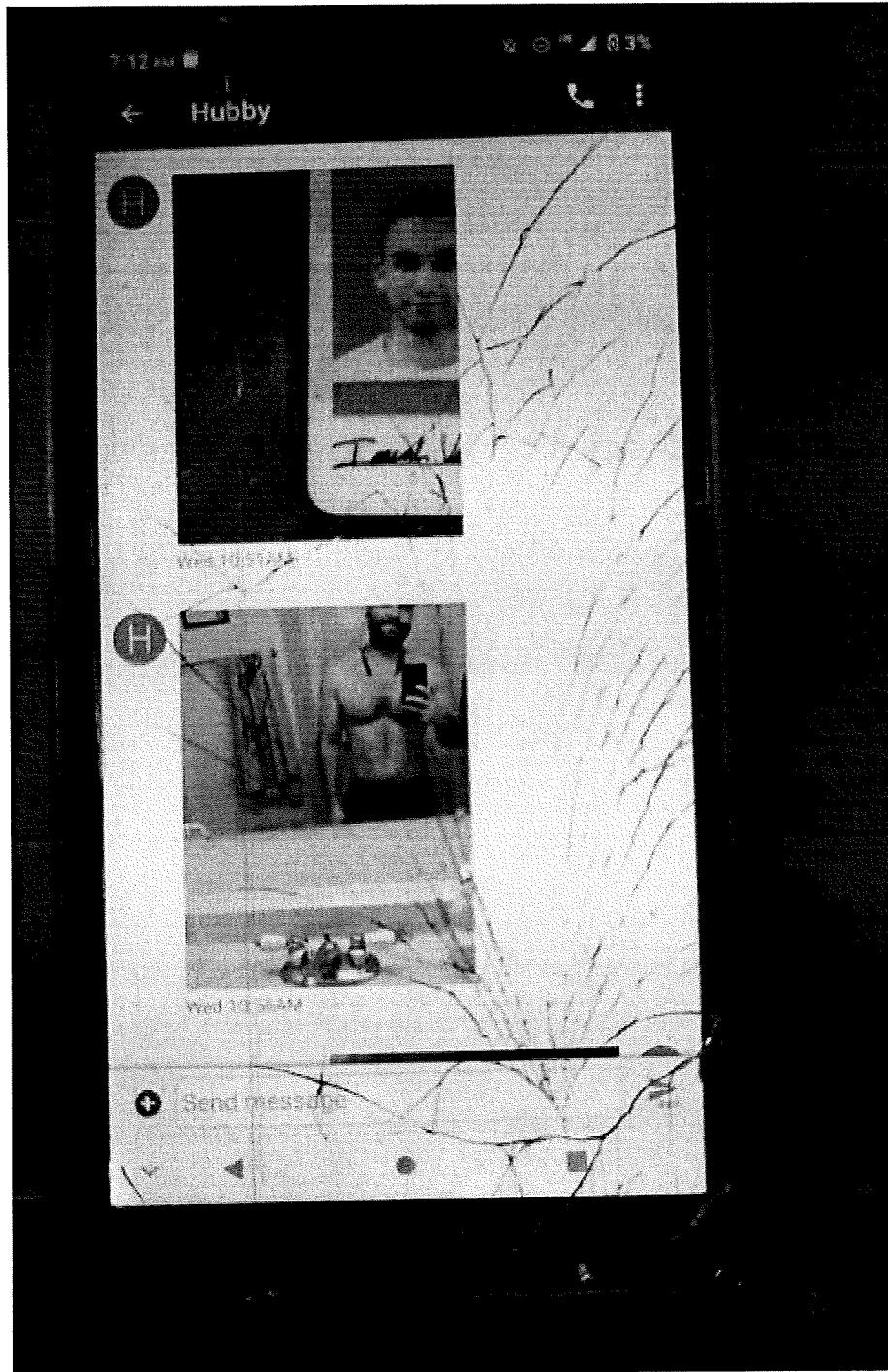
VALLEJO: **Sends a selfie of his face**

VALLEJO: **Sends photo of his erect penis**

VALLEJO: I belong to you <VICTIM's full name>

VICTIM: I belong do you Isaiah Elijah Abraham Vallejo

1
2 VALLEJO: I hate the idea of what people will think of me <VICTIM's name>. But I want
3 you to understand that not even those powerful feelings are enough to keep me from you.
4



1 VALLEJO: If she's really leaving for a week then this is my opportunity to go to you

2 VALLEJO: I will see if I can change my flight

3 VALLEJO: **Sent two selfies, one being his drivers license photo**

4 8. Additionally, the VICTIM's mother found an additional photo on the VICTIM's phone
5 which was of the VICTIM lying on her stomach with her butt in the air, revealing her anus.

6 9. I ran ISAIAH ELIJAH ABRAHAM VALLEJO, DOB XX-XX-1990 which revealed a visual
7 match to the selfies VALLEJO sent, as well as the same driver's license photo which VALLEJO
8 sent the VICTIM.

9 **CONCLUSION**

10 10. Based on the foregoing, I believe that there is probable cause that Isaiah Elijah Abraham
11 Vallejo coerced or enticed a minor, or attempted to do so, in violation of Title 18 U.S.C. §
12 2422(b) and produced or attempted to produce child pornography in violation of 18 U.S.C. §§
13 2251(a) and (e).

14

15

16 Respectfully submitted,

17

18 
19 Emily Steele
20 Special Agent
21 Federal Bureau of Investigation

22 16

23 Subscribed and sworn before me this _____ of December, 2022

24 
25 HONORABLE EILEEN S. WILLETT
26 United States Magistrate Judge